

EXHIBIT B

Fair Fight vs Raffensperger

Lauren Groh-Wargo

09/16/2019

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF GEORGIA
3 ATLANTA DIVISION
4
5 FAIR FIGHT ACTION, et)
6 al.,)
7)
8 Plaintiffs,)
9)
10 vs.) CIVIL ACTION NO.
11)
12 BRAD RAFFENSPERGER, in) 1:18-CV-05391-SCJ
13 his official Capacity as)
14 Secretary of State of)
15 Georgia; et al.,)
16)
17 Defendants.)

10

11 THIS DEPOSITION CONTAINS INFORMATION DESIGNATED
12 CONFIDENTIAL SUBJECT TO PROTECTIVE ORDER

12

13 DEPOSITION OF LAUREN GROH-WARGO

14 (Taken by Defendants)

15 September 16, 2019

16 10:05 a.m.

17

18

19

20 Suite 1650
21 1180 West Peachtree Street
22 Atlanta, Georgia

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25 Reported by: Debra M. Druzisky, CCR-B-1848

1 more informative presentations where you're telling
2 people about Fair Fight, either Action or Inc.?

3 A. I don't -- I haven't used it in some
4 time.

5 Q. Okay.

6 A. So I honestly don't recall the ways I
7 used it. This says it's in December.

8 Q. Okay. If you can turn to slide eight,
9 which is the one entitled Our Barrier. The heading
10 under Our Barrier is A Remarkable Architecture of
11 Voter Suppression, and the first bullet is:

12 "1.6 million voters purged between
13 2010 and 2018."

14 Do you see that?

15 A. I do.

16 Q. Is it your personal opinion that all of
17 those voters that were purged should not have been,
18 or were there some that were within that group that
19 were, in fact, ineligible to vote?

20 A. I don't know the answer to that.

21 Q. Okay. All right. And then the 53,000
22 voters in the two-down bullet point held by "exact
23 match," where did that number come from?

24 A. I don't recall. But I do believe that
25 was a number reported in the press.